

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JANE DOE 1 and JANE DOE 2,

Docket No. 23-CV-5294

Plaintiffs,

DECLARATION

vs.

THE CONGREGATION OF THE SACRED HEARTS
OF JESUS AND MARY, DIOCESE OF FALL RIVER,
SISTERS OF CHARITY OF MONTREAL (“GREY
NUNS”), SISTERS OF CHARITY OF QUEBEC
(“GREY NUNS”), MISSIONARY OBLATES OF
MARY IMMACULATE EASTERN PROVINCE (THE
“OBLATES”), AND BLACK AND WHITE
CORPORATIONS 1-10, Defendants.
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I, Ashley Marie Pileika, declare under penalty of perjury that the following facts are true and correct:

1. I have worked diligently on behalf of Plaintiffs—survivors of child sexual abuse—for over two years; they deserve justice, the first step being jurisdictional discovery.
2. Our law firm has spent months researching archives and has hired a private investigative team to ensure we have named the correct Defendants, as described herein.
3. In this search, we have discovered the following websites and photographs that evidence Defendants’ culpability, including the exhibits attached to my Declaration.
4. When priests and nuns sexually molested children, they did not wear name tags.
5. Despite wearing habits that can only be described as iconic to the Roman Catholic Church and being in control of the “bad” priests and nuns’ files, the Roman Catholic Church continues to place the impetus on victims to identify the priest(s), nun(s), religious order(s), and diocese(s), responsible for their abuse.
6. One can understand why this is problematic—albeit cruel— to require victims of child sexual abuse to do so; the personnel files of these predators should be made public—as

many dioceses have done by creating credibly accused lists; but, not so, for the Oblates and Grey Nuns.

7. Specific to Jane Doe 1 and Jane Doe 2—Plaintiffs’ boarding school was run by the Congregation of the Sacred Hearts of Jesus and Mary. It was brought to our attention the nuns responsible for Plaintiffs’ sexual and physical abuse are—literally—nowhere to be found.
8. It was also brought to our attention the Grey Nuns were involved and responsible for Plaintiffs’ sexual abuse. Originally, we identified the Grey Nuns of Montreal; after speaking with Michael Kerrigan—counsel for the Grey Nuns of Montreal—it was Mr. Kerrigan’s position the “correct” order of Grey Nuns to name as a Defendant to this lawsuit was the Grey Nuns of Quebec.
9. As such, we then added the Grey Nuns of Quebec as a Defendant to this lawsuit.
10. But the Grey Nuns of Quebec did not accept responsibility in this matter and then pointed a finger back at the Grey Nuns of Montreal; so, as we have respectfully stated to Defendants’ counsel, it would not behoove Plaintiffs to nonsuit either Grey Nun entity prior to obtaining jurisdictional discovery in this matter.
11. Further, counsel for the Grey Nuns also intimated there were likely other responsible entities in this matter; given the connection between the Grey Nuns and the Oblates—and clear identification by the Plaintiffs of Oblate priests directly involved in their abuse—we added the Oblates as a Defendant to this lawsuit.
12. As indicated, when priests and nuns sexually abuse and assist in the sexual abuse of children, they do not wear name tags. They all appear as Roman Catholic priests and nuns. And they do not name other responsible entities that fall under the Roman Catholic Church as third party defendants to these matters. As such, our clients—survivors of the most horrific child sexual abuse—and their legal teams must delve through photographs,

newspaper archives, and other publicly available information to discern *who* and *which* entities are responsible for their sexual abuse.

13. To put it lightly, this is a heart-wrenching and all-encompassing endeavor. And, as the Court will note from Defendants' motions to dismiss, not one Defendant has called into question whether Plaintiffs were sexually abused. It is a fact that Plaintiffs were sexually abused as children in the State of New York by priests and nuns that were employed and controlled by the Roman Catholic Church.
14. Plaintiffs and their legal team have gone to extreme lengths to correctly name the responsible Defendants in this matter. To accuse an individual and/or an entity of child sexual abuse is a grave accusation that no one should take lightly. And I do not.
15. I have gone to all lengths possible to weigh the interests of my clients against the right of these Defendants to be free from false accusations of child sexual abuse lodged against them.
16. Out of professional courtesy for Defendants' counsel, I have not included email correspondences, deposition transcripts, or other documents that further evidence this.

Dated: November 16, 2023

By: _____

Ashley M. Pileika

Law Office of Darren Wolf, P.C.

Attorney for Plaintiffs

